

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

)	
UNITED STATES OF AMERICA)	
)	
v.)	Case No. 1:21-cr-00622-APM
)	
MITCHELL TODD GARDNER II)	
)	
)	

DEFENDANT’S MOTION FOR LEAVE TO LATE FILE PRETRIAL MOTIONS

Mitchell Todd Gardner II, by and through undersigned counsel, respectfully moves this Honorable Court for leave to late file his: 1) Motion to Dismiss Counts One, Two, Five, Six, and Seven of the Indictment; 2) Motion to Suppress Witness 1’s Photo Identification; and 3) Motion to Transfer Venue.

On June 9, 2022, this Court set a deadline for June 16, 2022 for Mr. Gardner to file pre-trial motions. Due to unforeseen complications in the above-listed matter and other ongoing matters, counsel required an additional day to file the attached

WHEREFORE, counsel respectfully requests leave to late file the aforementioned motions.

Respectfully submitted,

_____/s/_____
David B. Benowitz
D.C. Bar # 451557
Counsel for Michael Todd Gardner II
Price Benowitz LLP
409 Seventh Street, NW
Suite 200
Washington, D.C. 20004
Phone: (202) 271-5249
Fax: (202) 664-1331
David@pricebenowitz.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of June 2022, I caused a true and correct copy of the foregoing Motion to for Leave to Late File Pretrial Motions to be delivered via CM/ECF to all parties in this matter.

_____/s/_____
David B. Benowitz